| Case                            | 3:21-bk-11710-SC Doc 322 Filed 02/02<br>Main Document   | /23 Entered 02/02/23 08:33:08 Desc<br>Page 1 of 4              |  |  |
|---------------------------------|---|--|--|--|
| 1<br>2<br>3<br>4<br>5<br>6<br>7 | Robert P. Goe – State Bar No. 137019 Brandon J. Iskander – State Bar No. 300916 GOE FORSYTHE & HODGES, LLP 17701 Cowan Avenue, Suite 210, Building D Irvine, CA 92614 rgoe@goeforlaw.com biskander@goeforlaw.com  Telephone: (949) 798-2460 Facsimile: (949) 955-9437  Attorneys for The Huntington Beach Gables Homeowners Association |  |  |  |
| 8                               | UNITED STATES   | BANKRUPTCY COURT   |  |  |
| 9                               | CENTRAL DISTRICT OF CALIFORNIA  |  |  |  |
| 10                              | SANTA ANA DIVISION  |  |  |  |
| 11                              |   |  |  |  |
| 12                              | In re:  | Case No. 8:21-bk-11710-SC                                      |  |  |
| 13                              | JAMIE LYNN GALLIAN,   | Chapter 7 Proceeding   |  |  |
| 14                              |   | THE HUNTINGTON BEACH GABLES                                    |  |  |
| 15                              | Debtor.   | HOMEOWNERS ASSOCIATION'S JOINDER TO TRUSTEE'S OPPOSITION       |  |  |
| 16                              |   | TO DEBTOR'S NOTICE OF HEARING AND MOTION REQUESTING THE        |  |  |
| 17                              |   | TRUSTEE ABANDON ESTATE'S INTEREST IN DEBTOR'S PRIMARY          |  |  |
| 18                              |   | RESIDENCE, SPACE 376 2014 SKYLINE<br>MANUFACTURED HOME LBM1981 |  |  |
| 19<br>20                        |   | MANOPACTURED HOME EDMI701                                      |  |  |
| 20                              |   | Zoom Hearing: Date: February 15, 2023                          |  |  |
| 22                              |   | Time: 11:00 a.m. Place.: Courtroom 5C                          |  |  |
| 23                              |   | U.S. Bankruptcy Court<br>411 W. Fourth Street                  |  |  |
| 24                              |   | Santa Ana, CA 92708  |  |  |
| 25                              |   |  |  |  |
| 26                              | The Huntington Beach Gables Homeov  | vners Association hereby files its <i>Joinder</i> to Trustee's |  |  |
| 27                              | Oppositions to Debtor's Notice of Hearing and Motion Requesting the Trustee Abandon Estate's  |  |  |  |
| 28                              | Interest in Debtor's Primary Residence, Space   | 376 2014 Skyline Manufactured Home LBM1981                     |  |  |

| Case     | 8:21-bk-11710-SC     | Doc 322 Filed 02/0<br>Main Document | 02/23<br>Pa( | B Entered 02/02/23 08:33:08 I<br>ge 2 of 4               | Desc |
|----------|----------------------|-------------------------------------|--------------|--|------|
| 1        | (Docket Nos. 318 and | l 319) filed on Februar             | y 1, 2       | 023.   |      |
| 2        |                      |                                     | Resp         | pectfully submitted,                                     |      |
| 3        | DATED: February 2    | , 2023                              | GO           | E FORSYTHE & HODGES LLP                                  |      |
| 4        |                      |                                     | Bv:          | /s/Robert P. Goe   |      |
| 5        |                      |                                     | J            | Robert P. Goe  |      |
| 6<br>7   |                      |                                     |              | Brandon J. Iskander<br>Attorneys for The Huntington Beac | h    |
| 8        |                      |                                     |              | Gables Homeowners Association                            |      |
| 9        |                      |                                     |              |  |      |
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| 28       |                      |                                     |              |  |      |

| 1   | PROOF OF SERVICE OF DOCUMENT  |  |  |  |  |  |
|-----|---|--|--|--|--|--|
| 2 3 | I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan Avenue, Suite 210, Building D, Irvine, CA 92614  |  |  |  |  |  |
| 4   | A true and correct copy of the foregoing document entitled (specify): THE HUNTINGTON BEACH GABLES HOMEOWNERS ASSOCIATION'S JOINDER TO TRUSTEE'S OPPOSITION TO DEBTOR'S  |  |  |  |  |  |
| 5   | NOTICE OF HEARING AND MOTION REQUESTING THE TRUSTEE ABANDON ESTATE'S  INTEREST IN DEBTOR'S PRIMARY RESIDENCE, SPACE 376 2014 SKYLINE MANUFACTURED  HOME LBM1981 will be served or was served (a) on the judge in chambers in the form and manner  |  |  |  |  |  |
| 6   | required by LBR 5005-2(d); and <b>(b)</b> in the manner stated below:   |  |  |  |  |  |
| 7   | 1. <u>TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)</u> : Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On February 2, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: |  |  |  |  |  |
| 8 9 |   |  |  |  |  |  |
| 10  |   |  |  |  |  |  |
| 11  |   |  |  |  |  |  |
| 12  | 2. SERVED BY UNITED STATES MAIL: On (date) February 2, 2023, I served the following persons and/or entities at the last known addresses in  |  |  |  |  |  |
| 13  | this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the jud here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the   |  |  |  |  |  |
| 14  | document is filed.  |  |  |  |  |  |
| 15  | Jamie Lynn GallianJanine JassoMichael D Poole16222 Monterey Ln Unit 376PO Box 370161Feldsott & Lee  |  |  |  |  |  |
| 16  | Huntington Beach, CA 92649 El Paso, CA 79937 23161 Mill Creek Dr Ste 300 Laguna Hills, CA 92653   |  |  |  |  |  |
| 17  |   |  |  |  |  |  |
| 18  | 3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL</u> (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date   |  |  |  |  |  |
| 19  | February 2, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or   |  |  |  |  |  |
| 20  | email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge <u>will be completed</u> no later than 24 hours after the document is filed.  |  |  |  |  |  |
| 21  | The Scott Clarkson, USBC, 411 West Fourth Street, Suite 5130, Santa Ana, CA 92701   |  |  |  |  |  |
| 22  | (SUSPENDED DUE TO COVID 19 PROTOCOLS)   |  |  |  |  |  |
| 23  | I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.  |  |  |  |  |  |
| 24  | i deciale under penalty of perjury under the laws of the officed states that the foregoing is true and correc   |  |  |  |  |  |
| 25  | February 2, 2023 Kerry A. Murphy /s/Kerry A. Murphy  Date Printed Name Signature  |  |  |  |  |  |
| 26  |   |  |  |  |  |  |
| 27  |   |  |  |  |  |  |

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| 1   | TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):   |
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| 2   |  |
| 3   | <ul> <li>Bradford Barnhardt bbarnhardt@marshackhays.com,<br/>bbarnhardt@ecf.courtdrive.com,kfrederick@ecf.courtdrive.com</li> <li>Aaron E. DE Leest adeleest@DanningGill.com,</li> </ul>                         |
| 5   | danninggill@gmail.com;adeleest@ecf.inforuptcy.com  • Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com  • Jeffrey I Golden (TR) lwerner@go2.law, jig@trustesolutions.net;kadele@go2.law |
| 6   | D Edward Hays ehays@marshackhays.com,<br>ehays@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@marshackhays.com;cmend  |
| 7 8 | oza@ecf.courtdrive.com  • Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com  • Eric P Israel eisrael@DanningGill.com, danninggill@gmail.com;eisrael@ecf.inforuptcy.com                           |
| 9   | Laila Masud Imasud@marshackhays.com, Imasud@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com   |
| 10  | <ul> <li>Mark A Mellor mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com</li> <li>Valerie Smith claims@recoverycorp.com</li> <li>United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov</li> </ul>     |
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